

**STATE OF NEW HAMPSHIRE
SITE EVALUATION COMMITTEE**

RE: Application for a Certificate of Site and Facility)
By Antrim Wind Energy, LLC)
SEC Docket Number 2015-02)

**RICHARD BLOCK AND LORANNE CAREY BLOCK’S
OBJECTION TO PETITIONS FOR INTERVENTION OF
KAREN WEISSWANGE, BENJAMIN PRATT, WESLEY ENMAN,
APRYL L. AND TIMOTHY A. PERRY, AND JOHN F. GIFFIN**

Richard Block and Lorraine Carey Block respectfully submit this Objection to the Petitions to Intervene of Karen Weisswange, Benjamin Pratt, Wesley Enman, Apryl L. and Timothy A. Perry, and John F. Giffin.

(1.) Standard for Intervention

Pursuant to the SEC’s Procedural Order of December 4, 2015, the New Hampshire Code of Administrative Rules Site 202.11(b), and RSA 541-A:32, the Committee shall grant a petition to intervene in this proceeding if (among other qualification standards) “the petition states facts demonstrating that the petitioner’s rights, duties, privileges, immunities, or other substantial interests might be affected by the proceeding or that the petitioner qualifies as an intervenor under any provision of law...”

(2.) Karen Weisswange, Benjamin Pratt, Wesley Enman, Apryl L. and Timothy A. Perry, and John F. Giffin have not demonstrated that their rights, duties, privileges, immunities, or other substantial interests might be affected by this proceeding, nor do they qualify as intervenors under the provision of the law.

None of the above Petitioners has demonstrated in their petitions that they have unique rights or substantial interests based on proximity of residence to the proposed Wind Turbine project. Additionally, all have stated, as reason for intervention, a support for the project as a substantial interest. This interest is no different from that of the Applicant and their expert witnesses and attorneys, and thus will be amply represented in the Proceedings.

a. Karen Weisswange

Ms. Weisswange states, as her only reason for requesting Intervenor status, “because I want the SEC committee to hear from someone who is for the proposed wind project.” A viewpoint on an issue, either for or against, does not establish qualification for intervenor status. As stated above, this viewpoint will be more than adequately represented by the Applicant, their witnesses, and several other parties. Additionally, there will be numerous opportunities for Ms. Weisswange to comment directly to the SEC, either via written correspondence at any time, or during the upcoming public hearing on February 22, 2016 and during the actual evidentiary hearings later this year.

b. Benjamin Pratt

Mr. Pratt makes no statement of any kind in his petition to demonstrate “substantial interest.” Instead he relates his opinion that “it is imperative that The State of New Hampshire, the United States of America and the rest of the World abandon its reliance on fossil fuels and adopt renewable sources of energy as rapidly as possible” and that “Antrim Wind’s proposed project will bring benefits to the Town of Antrim and the State of New Hampshire.” This is an opinion and does not establish qualification for intervenor status. Mr. Pratt likewise will have ample opportunity for written and oral comments to the SEC.

c. Wesley Enman

Mr. Enman, in his petition, fails to state facts which establish any unique rights or substantial interests to qualify him as an intervenor. His sole reason for petitioning is his hope “to provide an alternative reality to the potential impacts and benefits this project will bring to Antrim and the surrounding area.” Mr. Enman may provide the SEC with this “alternative reality” in any of the public comment opportunities available during the course of this proceeding.

d. Apryl L. Perry and Timothy A. Perry

Mr. and Mrs. Perry, in their petition, provide much in the way of research and statistics about global warming and renewable energy as well as their opinions of the potential impact of this proposed project on the Town of Antrim, yet at no point do they offer any facts that establish their substantial rights and interests as intervenors. The information in their Petition for Intervention would more appropriately be presented as public commentary to the SEC at the designated time and manner for such.

e. John F. Giffin

Mr. Giffin’s petition fails to establish any facts justifying his “substantial rights, interests and duties” which would qualify him as an intervenor. Like Mr. and Mrs. Perry, Mr. Giffin instead uses his petition as a forum to present his arguments in favor of the Antrim Wind project. His inclusion of his chairmanship of the Antrim Zoning Board of Adjustments as a qualification is moot, as he is petitioning for intervention as an individual without the support or sanction of the ZBA.

(3.) Conclusion

Intervenor status is properly granted when the petitioner has clearly demonstrated facts establishing that rights, duties, privileges, immunities, or other substantial interests might be affected by the outcome of a proceeding; that the petitioner has proven qualification as having legal “standing” in a case; and that the inclusion of the petitioner as an intervenor is in the interest of justice and would not impair the orderly and prompt conduct of the proceeding. None of the above petitioners has demonstrated substantial rights, duties, privileges, immunities, or interests nor has any established legal standing. It should also be noted that none of the above petitioners applied for intervention in any of the three previous Antrim Wind dockets before the SEC. Since the prime focus of each of the above petitions is, instead of providing documentation to support a claim of qualification as an intervenor, to submit opinions about the proposed project and Antrim Wind’s application, then the granting of intervenor status in these cases would do nothing to

further the interest of justice and enhance the orderly and prompt conduct of the proceeding. For these reasons, the SEC should deny their petitions.

Dated this 25th day of January, 2016.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'Richard Block', with a large, stylized initial 'R' and a long horizontal flourish extending to the right.A handwritten signature in black ink, appearing to be 'Lorraine Carey Block', written in a cursive style.

Richard Block
Lorraine Carey Block
63 Loveren Mill Road
Antrim, New Hampshire 03440
603-588-2552
snowstar@tds.net